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Attorney for Defendant
ARNES KRAJINIC

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,
v.

ARNES KRAJINIC,

Defendant.

Case No.: 2:23-CR-00074-DJC

STIPULATION REGARDING
EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: July 13, 2023

TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on July 13, 2023.
2. By this stipulation, the parties move to continue the status conference until
August 31, 2023, at 9:00 a.m., and to exclude time through August 31, 2023, under Local
Code T4.

3. The parties agree and stipulate, and request that the Court find the following:
a) The government has represented that the discovery associated with this case
includes search warrants, photographs, audio recordings, and video recordings. This
discovery has been either produced directly to counsel and/or made available for
inspection and copying.

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b) Counsel for defendant desires additional time to consult with his client regarding discovery and otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of July 13, 2023 to August 31, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 6, 2023

/s/ David D. Fischer

DAVID D. FISCHER
Attorney for Defendant
ARNES KRAJINIC

PHILLIP A. TALBERT
US ATTORNEY

Dated: July 6, 2023

/s/ Emily Sauvageau

EMILY SAUVAGEAU
Assistant United States Attorney

ORDER

IT IS SO FOUND AND ORDERED this 7th day of July, 2023.

Dated: July 7, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE